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July 1, 2014

Via Hand Delivery

Ms. Marlene Dortch
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: FCC Form 481 - High-Cost Support Information and Low-Income Support Information
Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a)

Dear Secretary Dortch:

Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a) of the Federal Communication Commission's regulations, please find enclosed the FCC Form 481 for TelAlaska Cellular, Inc. This form was also filed at the Regulatory Commission of Alaska (RCA) and USAC.

TelAlaska Cellular, Inc. seeks confidential treatment for its financial information pursuant to the Protective Order, Connect America Fund, et al., WC Docket No. 10-90 et al., (Nov. 16, 2012). A redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under 47 C.F.R. §§ 0.457 and 0.459 of the initial § 54.202(a) Five-Year Service Quality Improvement Plan.

Please do not hesitate to contact me if you have any questions or I may be of any assistance.

Sincerely,

DYKEMA GOSSETT PLLC

Shannon M. Heim

4000 Wells Fargo Center

90 South Seventh Street

Minneapolis, MN 55402

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SMHE/eb1

Enclosure



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July 1, 2014

Via Hand Delivery

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: FCC Form 481 - High-Cost Support Information and Low-Income Support Information
Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a)

Dear Ms. Dortch:

Pursuant to the Protective Order in *Connect America Fund, et al.*, WC Docket No. 10-90 *et al.* (Nov. 16, 2012) and 47 C.F.R. §§ 0.457 and 0.459, TelAlaska Cellular, Inc., by its attorneys, hereby requests that certain materials and information be withheld from public inspection. Specifically, TelAlaska Cellular, Inc. request confidential treatment of the Five-Year Service Quality Improvement Plan (the "Plan") attached to its Form 481 filing.

In support of its request for confidential treatment and pursuant to the requirements under 47 C.F.R. § 0.459(b), TelAlaska Cellular, Inc. states the following:

1. Identification of the specific information for which confidential treatment is sought.

TelAlaska Cellular, Inc. seeks confidential treatment of the Plan attached to the Form 481 filing accompanying this letter. The Plan contains sensitive financial information about TelAlaska Cellular, Inc. as well as information about TelAlaska Cellular, Inc.'s projected network improvements and upgrades for voice and broadband services during the period from 2015 through 2019.

2. Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.

The documents are being submitted as part of the annual Eligible Telecommunications Carrier ("ETC") Report (Form 481) mandated by 47 C.F.R. § 54.313.

Ms. Marlene Dortch, Secretary
July 1, 2014
Page 2

3. *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.*

The data described is highly confidential and sensitive commercial and financial information which constitutes trade secrets or sensitive commercial and financial information that would “customarily be guarded from competitors”¹ and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and 47 C.F.R. § 0.457(d).²

4. *Explanation of the degree to which the information concerns a service that is subject to competition.*

The Plan relates to voice and broadband services provided by TelAlaska Cellular, Inc. that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

Specifically, the Plan sets forth in detail the services provided by TelAlaska Cellular, Inc. over its existing network including location of customers, as well as planned network improvement and maintenance for 2015 through 2019, including project dates, populations impacted by the improvements and upgrades, and projected capital costs associated with maintaining the network. This information is competitively sensitive information related to the company’s existing network and planned upgrades and maintenance, and would benefit TelAlaska Cellular, Inc.’s competitors if they were able to have access to this information.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Disclosure of the Plan is likely to result in substantial competitive harm to TelAlaska Cellular, Inc. because the Plan could provide competitors with commercially sensitive insights related to TelAlaska Cellular, Inc.’s operations, service offerings, and costs.

6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.*

TelAlaska Cellular, Inc. does not make the Plan or any of the information contained therein publically available in any way. The Plan is only made available to key employees with a direct need-to-know basis. This production has been completed by outside counsel.

¹ 47 C.F.R. § 0.457(d)(2).

² 5 U.S.C. § 522(b)(4).

Ms. Marlene Dortch, Secretary
July 1, 2014
Page 3

7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.*

TelAlaska Cellular, Inc. does not make the Plan available to the public and it has not previously allowed disclosure of the Plan to third parties that are not otherwise bound by confidentiality obligations.

8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.*

The Plan should be treated as confidential for an indefinite period, as TelAlaska Cellular, Inc. will always be subject to competition and the competitive harms associated with the disclosure of the Plan.

9. *Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.*


None.

In order to provide adequate protection from public disclosure, TelAlaska Cellular, Inc. requests that the Commission strictly limit distribution of the Plan within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside of the Commission requests disclosure of the Plan, TelAlaska Cellular, Inc. requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary and appropriate.

Please do not hesitate to contact me if you have any questions or I may be of any assistance.

Sincerely,

DYKEMA GOSSETT PLLC



Shannon M. Heim

SMHE/ebf

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

 FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	619013
<015> Study Area Name	TeiAlaska Cellular, Inc.
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Robert Dunn
<035> Contact Telephone Number: Number of the person identified in data line <030>	9075632003 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	bdunn@telalaska.com

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 50px; width: 100%;"></div> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 50px; width: 100%;"></div> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div style="border: 1px solid black; height: 50px; width: 100%;"></div> 619013ak510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div style="border: 1px solid black; height: 50px; width: 100%;"></div> 619013ak610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> <div style="border: 1px solid black; height: 50px; width: 100%;"></div>	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000> Form 481 Program Year 2015	REDACTED -- FOR PUBLIC INSPECTION	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<3010> 13ak112	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	619013
<015>	Study Area Name	TelAlaska Cellular, Inc.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Robert Dunn
<035>	Contact Telephone Number - Number of person identified in data line <030>	9075632003 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdunn@telalaska.com

<110> Has your company received its ETC certification from the FCC? (yes / no) ☐ ☒

If your answer to Line <110> is yes, do you have an existing § 54.202(a) "5 year plan" filed with the FCC? (yes / no) ☐ ☐

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

619013ak112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets

<114> Report how much universal service (USF) support was received

<115> How (USF) was used to improve service quality

<116> How (USF) was used to improve service coverage

<117> How (USF) was used to improve service capacity

<118> Provide an explanation of network improvement targets not met in the prior calendar year.

✓
✓
✓
✓
✓
✓

Data Collection Form

CMB Control No. 3060-0986/CMB Control No. 3060-0819

July 2013

<015>	Study Area Name	TelAlaska Cellular, Inc.
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<020>	Program Year	2015
-------	--------------	------

<030>	Contact Name - Person USAC should contact regarding this data	Robert Dunn
-------	---	-------------

<035> Contact Telephone Number - Number of person identified in data line <030> 9075632003 ext. -

<039> Contact Email Address - Email Address of person identified in data line <030> bdunn@telalaska.com

[illegible]

<010>	Study Area Code	619013
<015>	Study Area Name	TelAlaska Cellular, Inc.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Robert Dunn
<035>	Contact Telephone Number - Number of person identified in data line <030>	9075632003 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rdunn@telalaska.com

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

2/1/2014

[illegible]

-- See attached worksheet

FCC Form 481
OMB Control No. 3060-0986/CMB Control No. 3060-0819
July 2013

<010>	Study Area Code	619013
<015>	Study Area Name	TelAlaska Cellular,
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Robert Dunn
<035>	Contact Telephone Number - Number of person identified in data line <030>	9075632003 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdunn@telalaska.com

[illegible]

(800) Operating Companies
Data Collection Form

<010>	Study Area Code	619013
<015>	Study Area Name	TelAlaska Cellular, Inc.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Robert Dunn
<035>	Contact Telephone Number - Number of person identified in data line <030>	9075632003 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdunn@telalaska.com
<810>	Reporting Carrier	TelAlaska Cellular, Inc.
<811>	Holding Company	TelAlaska Holdings, Inc.
<812>	Operating Company	TelAlaska Cellular, Inc.

[illegible]

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	619013
<015>	Study Area Name	TelAlaska Cellular, Inc.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Robert Dunn
<035>	Contact Telephone Number - Number of person identified in data line <030>	9075632003 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdunn@telalaska.com

<910> Tribal Land(s) on which ETC Serves

All exchanges served by TelAlaska Cellular, Inc., are Alaska Native lands.

<920> Tribal Government Engagement Obligation

619013ak920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, NA)
Yes

Yes
Yes
Yes
Yes
Yes
Yes
Yes
NA

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	619013
<015>	Study Area Name	TelAlaska Cellular, Inc.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Robert Dunn
<035>	Contact Telephone Number - Number of person identified in data line <030>	9075632003 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdunn@telalaska.com

Please check this box to confirm no terrestrial backhaul
<1120> options exist within the supported area pursuant to § 54.313(G) ☐

Please check this box to confirm the reporting carrier offers
<1130> broadband service of at least 1 Mbps downstream and 256 kbps
upstream within the supported area pursuant to § 54.313(G) ☐

(1200) Terms and Condition for Lifeline Customers

Lifeline
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3050-0819

July 2013

<010>	Study Area Code	619013
<015>	Study Area Name	TelAlaska Cellular, Inc.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Robert Dunn
<035>	Contact Telephone Number - Number of person identified in data line <030>	9075632003 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdunn@telalaska.com

619013ak1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <http://www.telalaska.com/cellular/Lifeline-Plans>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,



<1222> Details on the number of minutes provided as part of the plan,



<1223> Additional charges for toll calls, and rates for each such plan.



FCC Form 481 Program Year 2015
619013ak112

REDACTED -- FOR PUBLIC INSPECTION

Page 10 of 29

(2000) Price Cap Carrier Additional Documentation Data Collection Form <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	619013
<015>	Study Area Name	TelAlaska Cellular, Inc.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Robert Dunn
<035>	Contact Telephone Number - Number of person identified in data line <030>	9075632003 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdunn@telalaska.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting	
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)}
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}
Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}	
<2012>	2013 Frozen Support Certification
<2013>	2014 Frozen Support Certification
<2014>	2015 Frozen Support Certification
<2015>	2016 and future Frozen Support Certification
Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}	
<2016>	Certification Support Used to Build Broadband
Connect America Phase II Reporting {47 CFR § 54.313(e)}	
<2017>	3rd year Broadband Service Certification
<2018>	5th year Broadband Service Certification
<2019>	Interim Progress Certification
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	613013
<015>	Study Area Name	TelAlaska Cellular, Inc.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Robert Dunn
<035>	Contact Telephone Number - Number of person identified in data line <030>	9075632003 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rdunn@telalaska.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

- (3010) Progress Report on 5 Year Plan
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

- (3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- (3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))

Name of Attached Document Listing Required Information

- (3013) Is your company a Privately Held RCR Carrier (47 CFR § 54.313(f)(2))
(3014) If yes, does your company file the RUS annual report

(Yes/No)

(Yes/No)

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)
(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

- (3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

- (3018) If the response is no on line 3014, is your company audited?

(Yes/No)

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

- (3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

- (3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

- (3023) Underlying information subjected to a review by an independent certified public accountant

- (3024) Underlying information subjected to an officer certification.

- (3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

- (3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0916/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	619013
<015> Study Area Name	TelAlaska Cellular, Inc.
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Robert Dunn
<035> Contact Telephone Number - Number of person identified in data line <030>	9075632003 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rdunn@telalaska.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: TelAlaska Cellular, Inc.	
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 06/28/2014
Printed name of Authorized Officer: Brett Carter	
Title or position of Authorized Officer: VP Finance	
Telephone number of Authorized Officer: 9075632003 ext.	
Study Area Code of Reporting Carrier: 619013	Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	619013	
<015> Study Area Name	TelAlaska Cellular, Inc.	
<020> Program Year	2015	
<030> Contact Name - Person USAC should contact regarding this data	Robert Dunn	
<035> Contact Telephone Number - Number of person identified in data line <030>	9075632003 ext.	
<039> Contact Email Address - Email Address of person identified in data line <030>	bdunn@telalaska.com	

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

TelAlaska Cellular, Inc.

100: Service Quality Improvement Reporting

112: Annual progress report pursuant to 47 CFR 54.313(a)(1).

TelAlaska Cellular, Inc (TCI) is an ETC designated by the Regulatory Commission of Alaska. Attached hereto, TCI provides copies of documents and information provided in the annual progress report to its 5 year network deployment plan submitted to the Regulatory Commission of Alaska.

113: Maps detailing progress towards meeting plan targets.

A map detailing the newly deployed service area reflecting progress towards meeting the plan targets and are shown below in this document.

114: Report how much universal service (USF) support was received.

		SUPPORT AMOUNT RECEIVED 2013
1	Federal High Cost Loop Support	\$285,865
2	Federal Interstate Common Line Support	\$362,637
3	Federal Local Switching Support	\$332,367
4	Federal Lifeline/Linkup Support	\$55,487
5	State Lifeline/Linkup Support	\$5,456
6	Total Federal and State Universal Service Support	\$1,041,812

115-117: How (USF) was used to improve service quality/overage/capacity.

TCI utilized universal service funds received in 2013 for the provision and maintenance of the core services for which the support is intended. TCI has cell towers and cellular services using Lemko Corporation's Node1™ and Node2™ as its wireless switching platform with the DBS3900 GSM base transceiver stations (BTS) for the local radio access network. In addition, TCI uses universal service funds as a reduction to its basic area service costs thereby keeping its services available at just, reasonable, and affordable rates pursuant to the universal service goals as set forth in the Telecommunications Act at Section 254 (b) (3).

During this 2013 reporting period, TCI was able to further its network deployment by completing upgrades to its GSM System in UnAlaska, expanding its coverage and

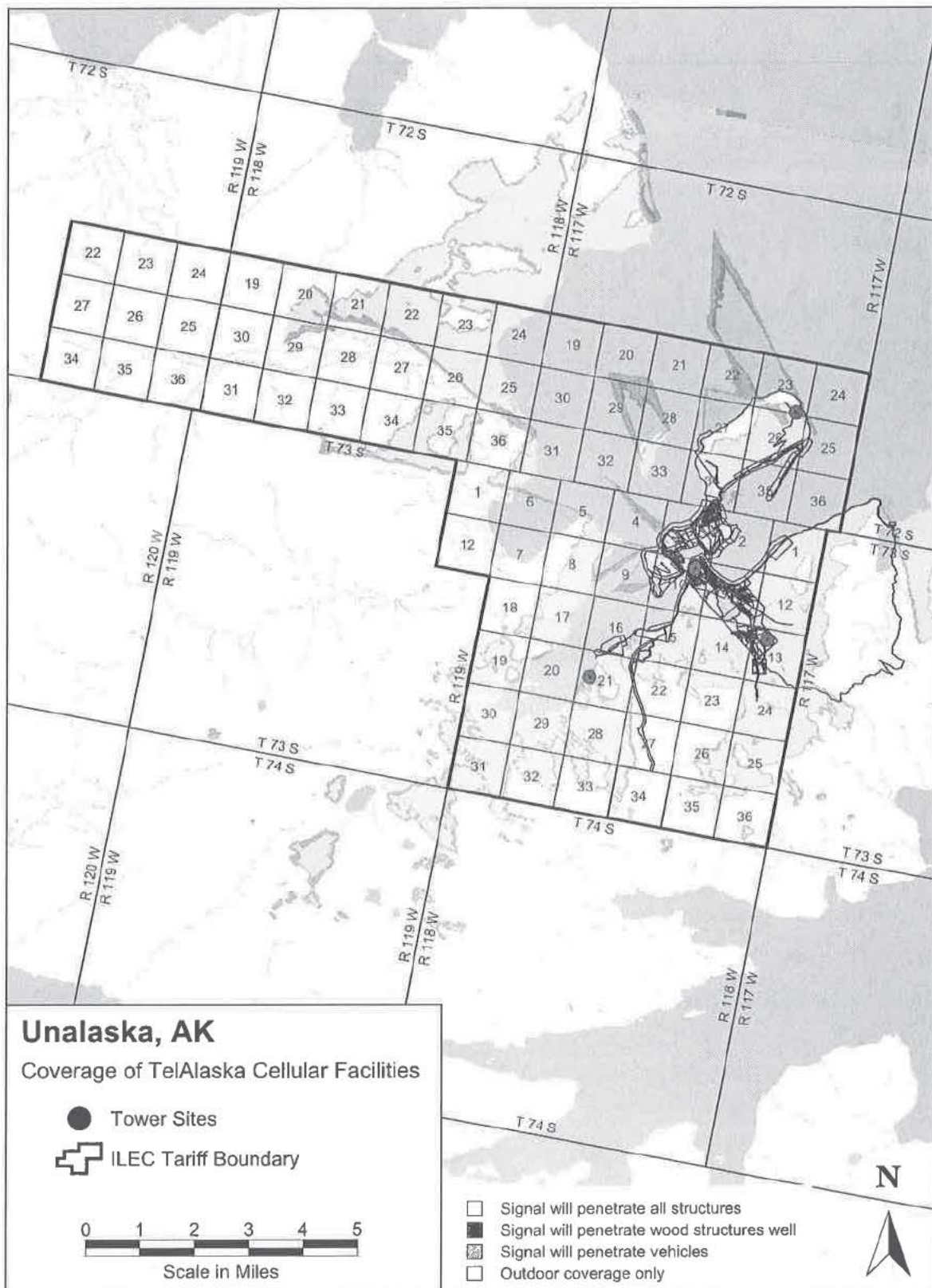
improving the resiliency of the network in the service area. See Exhibit B below in this document.

As reported in its prior year report, TCI had received the MVNO authorization from AT&T Mobility. With this MVNO, TCI installed its own wireless switch in Seward and provides roaming services on AT&T Mobility's network for Seward, Moose Pass and Cooper Landing subscribers. In its previous ETC report TCI had reported that it expected to install switches in the Seward, Moose Pass and Cooper Landing exchange areas in the 3rd quarter of 2013. The switch installed in Seward satisfied the requirements for coverage and did not require switches installed in additional locations. TCI's cell coverage in those exchanges mirrors AT&T Wireless.

118: An explanation of network improvement targets not met in the prior calendar year.

In its previous ETC report, filed in 2013, TCI had met its expectation to deploy facilities-based wireless service throughout its approved study area as described in its initial 5 year plan and subsequently revised annually as deemed necessary and documented in its ETC report filings each year.

There are no revisions expected at this time to the previously filed revisions to TCI's network deployment plans.



As it pertains to the Interior Study Area

TelAlaska Cellular, Inc.
2013 Network Improvements and Direct Operating Expense

EXHIBIT B
CONFIDENTIAL

2013 Total ETC Support Received **\$ 1,041,812**

Site Improvements

Unalaska/Dutch Harbor Cellular Service

Seward/Moose Pass/Cooper Landing Cellular Service

Total

Direct Operating Expenses¹

Total Site Improvements & Direct Operating Expenses¹

2013 Total ETC Support Spent **\$ 1,041,812**

¹Does not include operating expense overheads

TelAlaska Cellular, Inc.

500: Service Quality Standards & Consumer Protection Rules Compliance

510: TelAlaska Cellular, Inc certifies that it is in compliance with applicable consumer protection and service quality standards as set forth in Alaska Administrative Rules 3 AAC 53.450 and consumer protection rules as defined in 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag rules to prevent identity theft. A manual for each of those programs is in place and is part of the employees' handbook. Employee training is conducted and new hires are instructed on the programs as required by their job functions.

TelAlaska Cellular, Inc.

600: Functionality in Emergency Situations

610: TelAlaska Cellular, Inc (TCI) certifies that it has and will continue to take steps to remain functional in emergency situations in compliance with requirements set forth in 47 CFR 54.202(a)(2).

TCI provides cellular service in 20 communities. It uses a switch from one manufacturer (vendor) to provide the service. The manufacturer is Lemko. It utilizes distributed switching systems that will allow for continued local calling even in the event of a satellite link failure. All switches have a minimum eight hours of battery backup power to all network equipment. 7 switches have a backup generator which will provide power indefinitely. It provides an independent network throughout the study area that offers redundancy and promotes public safety in the event of a public emergency. As the affiliate of the incumbent local exchange carrier, TelAlaska Cellular, Inc. has a strong presence on the ground throughout the designated service area. The wireless systems comply with all state and federal 911/E911 requirements and works with each community to meet its unique 911 requirements.

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<039>	Contact Email Address - Email Address of person identified in data line <030>	bduunnetel@alaska.com
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<702> Single State-wide Residential Local Service Charge

<703>

[illegible]

[illegible]

920: Tribal Engagement Document

Tribal lands in Alaska are defined differently than what typically is used to describe tribal lands and tribal authority in the contiguous 48 States. Alaska Native Regions were not carved out of existing reservations and occupy a different legal status than allotments which are defined as Indian Country under 18 USC Sec. 1151. They include all Alaska Native Regions established pursuant to the Alaska Native Claims Settlement Act. (ANCSA), 43 U.S.C Sec. 1601. ANCSA lands do not qualify as Indian Country. This Act extinguished the Alaska tribes' aboriginal title to land, while creating village and regional corporations that received title to certain lands within 12 geographic regions of the state. The shareholders of those ANCSA corporations are primarily tribal members and their descendants. The ANCSA regions consist of the entire State of Alaska and are defined as tribal lands.

TelAlaska, Inc. subsidiary, TelAlaska Cellular, Inc. (TCI) was designated as an ETC by the Regulatory Commission of Alaska. It provides wireless cellular service to the study areas of Interior Telephone Company and Mukluk Telephone Company, Inc. The communities served are: Cold Bay, Cooper Landing, Fort Yukon, Galena, Iliamna, King Cove, Port Lions, Sand Point, Seward, Moose Pass and Unalaska, Elim, Golovin, Koyuk, Little Diomede, Shaktoolik, Shishmaref, St. Michael, Stebbins, Teller/Brevig Mission, Wales, White Mountain and Nome. These remote and very rural Alaskan communities are spread across a large area of the State: from 800 miles west of Anchorage on the Aleutian Islands, to over 400 miles north of Anchorage near the Arctic Circle on the Yukon River, on the Seward Peninsula and an island in the Bering Sea in western Alaska

921: Needs Assessment and Deployment Planning with Focus on Anchor Institutions

TCI strives to work in conjunction with its Alaskan Native community leaders and anchor institutions to assess, plan and deploy telecommunication facilities in its exchange service areas. During 2012, TCI undertook the following steps to communicate with its Alaskan Native community: Using its assembled list of native leaders with contact information for all of federally recognized tribes in TCI's serving areas from the Federal Register, Brenda Shepard, CEO and Dave Goggins, V.P. Operations initiated direct contact via phone calls to native leaders, covering all of TCI's service area. The purpose of these calls was to discuss and describe the Tribal Government Engagement Obligation as reported in the July 19, 2012 FCC Public Notice and open or continue a dialogue with the local leaders. During these direct conversations, the native community leaders offered direct and candid feedback on the quality of TCI's wireless service to their community as well as what if any concerns they may have regarding new service opportunities. Also discussed was TCI's cooperation with the community, State and FEMA in developing plans to mitigate future outages caused by severe storms and flooding. Employment opportunities for local hire were discussed. Ms. Shepard and Mr. Goggins shared TCI's plans on future network activity and provided the native leaders with direct contact information for any future discussions.

922: Feasibility and Sustainability Planning Tribal Land Network

See narrative response to 921.

923: Marketing Services in a Culturally Sensitive Manner

TelAlaska Cellular, Inc. staff has strived to devise marketing strategies that are culturally sensitive. Given that all of TCI's customers reside on Alaska Native Region lands, the intent of its marketing strategy is to appeal to, and be appropriate for, Alaskan Natives. TCI management and staff have attended regularly scheduled monthly community events and meetings. In addition, TCI staff work directly with local leaders and residents in the communities, which keeps TCI's marketing message continually fresh, relevant, and sensitive to the culture of those currently served and to be served in the future. Marketing materials also feature photos of Alaska Native families rather than purchased images from stock photo companies.

924: Rights-of-Way Processes

TCI obtains Right of Way permits from the State of Alaska, Federal agency or tribal organization which has the legal ROW authority over these lands. Local village administrations are also contacted as applicable before accessing roads, easements or private property, informed of the intended project and offered opportunities for feedback. TCI engineers design plans to ensure total compliance with all Right of Way permitting requirements.

925: Compliance with Land Use Permitting Requirements

TCI complies with all federal, state and/or local land use permitting requirements as applicable. There are no known specific tribal permitting requirements. As a component of its telecommunications infrastructure deployment planning process, TCI communicates with local village council representatives to inform them of planned land uses, provides a map of the impacted areas, offers opportunities for feedback and if applicable, obtains a letter of non-objection for placement of network facilities.

926: Compliance with Facility Siting Rules

TCI works to ensure that all required facility siting rules, federal, state, and other are completed to the satisfaction of these governmental authorities and consistent with the needs of the Alaska Native communities.

927: Compliance with Environmental Review Processes

TCI works to ensure that all required environmental assessments, federal, state, and other are completed to the satisfaction of these governmental authorities and consistent with the needs of the Alaska Native communities.

928: Compliance with Cultural Preservation Review Process

As an Alaskan company, TCI has the highest sensitivity regarding preserving the cultural integrity of the land. Understanding that Alaska native lands are rich with artifacts and ancient burials, TCI ensures that applicable cultural preservation requirements are always followed.

929: Compliance with Tribal Business and Licensing Requirements

N/A. TCI complies with all business and licensing requirements of the State of Alaska.

TelAlaska Cellular, Inc

1200: Terms and Condition for Lifeline Customers

TelAlaska Cellular, Inc provides wireless voice telephony service to eligible Lifeline subscribers.

1221: Information describing the terms and conditions of the wireless voice telephony service offered to Lifeline subscribers by TelAlaska Cellular, Inc are available on TelAlaska's website as shown in the copy below.

1222: TelAlaska Cellular's Lifeline plan offers Unlimited local calls and calls placed to and from communities within the TelAlaska Cellular Network.

1223: Any additional charges for calls (to include toll calls, roaming, and texting) placed under TelAlaska Cellular's Lifeline plan are identified on TelAlaska's website as shown in the attached copy.

TelAlaska

Cellular

Lifeline Plans

Individuals qualifying for the Lifeline assistance program may choose cellular phone service from TelAlaska for no monthly fee.

TelAlaska Cellular's Lifeline service plan provides:

- Unlimited local calls and calls placed to and from communities within the TelAlaska Cellular Network
- One FREE, high quality cell phone (VeryKool i133 or comparable)
- 400 Long Distance Minutes per month, in-state and out-of-state calling
- Voicemail and Calling Features
- FREE nationwide unlimited text messaging plan (a \$5.99 value)



Plan does not include "roaming" (long distance calls placed when you travel outside the TelAlaska Cellular Network). Roaming is 25¢ per minute. Long distance calls that exceed 400 minutes per month are 25¢ per minute. Monthly long distance allotments are calculated from the 24th of the month through the 23rd of the following month.

Lifeline is a government assistance program and documentation from one of these services is required for enrollment.

- Supplemental Security Income (SSI)
- Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps
- Medicaid
- Federal Public Housing Assistance
- Low Income Home Energy Assistance Program (LIHEAP)
- Bureau of Indian Affairs General Assistance
- Tribally-administered Temporary Assistance for Needy Families (TANF)
- Head Start Programs (only those meeting its income qualifying standard)
- National School Lunch Program (free meals program only)
- *NEW* You can now qualify if your income is at or below 135% of the Federal Poverty Guidelines.

Eligible customers may apply for Lifeline using this application: [Lifeline and Linkup Application](#).

For assistance in determining if there is more than one household at your residence, please complete this worksheet: [Lifeline Household Worksheet](#).

Notice to new and existing TelAlaska Cellular customers regarding the addition of the language below to our terms and conditions:

NOTICE TO NEW AND EXISTING SUBSCRIBERS REGARDING TRANSMISSION OF WIRELESS EMERGENCY ALERTS (Commercial Mobile Alert Service): TELALASKA CELLULAR presently does not transmit wireless emergency alerts. Notice required by FCC Rule 47 C.F.R. § 10.250 (Commercial Mobile Alert Service).

If you should have any questions regarding your service or this amendment to the terms and conditions, please call us at 1-877-478-2305.